



# **ENVIRONMENTAL TECHNICAL SERVICES**

AN ENVIRONMENTAL CONSULTING FIRM

(800) 200-4ETS

2004 - 2005 ANNUAL REPORT  
DOCUMENTING THE IMPLEMENTATION OF THE  
OPERATIONS AND MAINTENANCE PLAN

## **FORMER HECKATHORN NPL SITE**

Located At The

**LEVIN-RICHMOND TERMINAL CORPORATION  
402 WRIGHT AVENUE  
RICHMOND, CALIFORNIA**

June 2005

# **ENVIRONMENTAL TECHNICAL SERVICES**

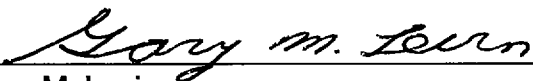
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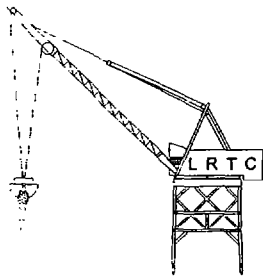
**LEVIN-RICHMOND TERMINAL CORPORATION  
402 WRIGHT AVENUE  
RICHMOND, CALIFORNIA**

  
\_\_\_\_\_  
Gary M. Levin  
Levin Richmond Terminal

7-1-2005  
Date

  
\_\_\_\_\_  
Helen Mawhinney  
Environmental Technical Services

6-30-05  
Date



# Levin-Richmond Terminal Corporation

402 Wright Avenue, Richmond, California 94804

Tel. (510) 232-4422 / Fax. (510) 236-0129

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July 6, 2005

Ms. Lynn Seur  
EPA Project Manager, Superfund Program  
US Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Re: Operations and Maintenance Plan for the former United Heckathorn Superfund Site Consent Decree,  
Levin Group

Dear Ms. Seur:

Please find enclosed documentation of the implementation of the Operations and Maintenance Plan (OMP) for the referenced site. The upland remedy implemented by Levin-Richmond Terminal Corporation and Levin Enterprises Inc. was approved by the U.S. Environmental Protection Agency on September 30, 1999. This current OMP Report is for the period ending June 2005.

Please contact me if you have any questions.

Regards,

Mike McCoy

cc: Gary Levin  
Keith Howard

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## 1.0 INTRODUCTION

This document is prepared for submittal to the United States Environmental Protection Agency (U.S. EPA), Hazardous Waste Management Division. Levin-Richmond Terminal Corporation (LRTC), in compliance with the State of California General Stormwater Permit for Discharges of Stormwater Associated with Industrial Activities (General Permit), has performed activities that are included in its Stormwater Monitoring Plan (SWMP). The SWMP also provides the basis for the evaluation of compliance with the General Permit and Stormwater Pollution Prevention Plan (SWPPP). The combination of the SWMP and the SWPPP comprises the stormwater monitoring and pollution prevention plans for the entire 42-acre site and facilities owned and operated by LRTC.

As required by the U.S. EPA Consent Decree, dated April 22, 1996 and the completed Upland Cap Installation, Former United Heckathorn Facility, Richmond, California, the Operations and Maintenance Plan (O&M Plan) describes the procedures for the long-term management of the upland capping system at the 4.5-acre Heckathorn NPL Site. The results of inspections, monitoring, and maintenance of the cap and drainage system are documented within this Annual Report. The upland remedy implemented by LRTC and Levin Enterprises Inc. was approved on September 30, 1999. There was no activity to report for the period ending June 2005. In order that the Annual Report of the O&M Plan may coincide with the Annual Report requirements of the SWMP and the SWPPP, LRTC submits both Annual Reports by July 1 of each year. All referenced reports and documents are available at LRTC and will be sent to U.S. EPA upon request.

This document presents the June 2005 summary of recent inspection and maintenance by LRTC of the cap and associated stormwater interceptors. Submittal of Annual Reports will be made for the reporting period, ending June 30 of each year.

### 1.1 Background

Environmental Technical Services (ETS) prepared and caused to be filed, on behalf of LRTC, the 2004-2005 Annual Report for Stormwater Discharges Associated with Industrial Activities, for the period ending June 2005. During the 2004 – 2005 reporting period no changes have been made to the Heckathorn NPL Site, including but not limited to material processes, capping, interceptors, and site construction. Site observations, monitoring, and “Good Housekeeping Practices” are performed on a daily basis.

## 1.2 Current Site Use

The Levin-Richmond Terminal Corporation operates a dry-bulk marine terminal encompassing approximately 42 acres. Total activities include uncovered storage of cargo materials such as metallurgical coke, petroleum coke, sand, bauxite, and manganese. The bulk cargo is stockpiled onsite and loaded onto vessels or unloaded from vessels to rail cars and trucks. The capped section of the former Heckathorn Site is used for stockpiling cargo and railroad operations.

## 2.0 CAP AND STORMWATER INTERCEPTORS

### 2.1 Description of Capping System

#### Concrete Cap

The cap is located in the upland area location of the former United Heckathorn Facility. The cap consists of a minimum of six inches of concrete aggregates with reinforcing steel wire. The reinforcing steel consists of a double layer of 6' by 6' W4.5 X W4.5 steel-welded wire fabric (WWF). In some areas the cap overlies asphalt. In the other areas where asphalt does not exist, the cap overlies a double layer of 4-inch by 4-inch W4.5 X W4.5 WWF. In these areas the sub-grade was prepared and compacted according to the specification approved by the U.S. EPA.

#### Geotextile Fabric and Gravel Cover

Some areas of the upland cap adjacent to railroad tracks and switches, where the storage and handling of bulk materials does not occur, were covered with a geotextile fabric and gravel. These areas consist of soils potentially containing pesticides. The geotextile membrane and six-inches of clean imported gravel cover these soils.

### 2.2 Inspection of Cap

The cap was inspected by John Peterson for Buster Building, General Contractor, License No. 513203 C8 (concrete), on June 14, 2005, and found to be intact and in good condition. The cap is also inspected quarterly by Environmental Technical Services (ETS), while performing stormwater and "Good Housekeeping" observations. The cap was found to be uncompromised with only occasional surface "feather" cracks typical of those which develop subsequent to the curing of freshly poured concrete. The cracks are insignificant and not indicative of stress fractures. These surface cracks are too small to repair. Refer to Attachment B for the Buster Building, General Contractor, Report of Cap Inspection, June 14, 2005.

## 2.3 Inspection of Drop Inlets and Interceptors

Visual observations of stormwater runoff and stormwater systems are performed on an as-needed basis during shipping activities, significant rainfall, dry and wet seasons. Work areas and surface conditions are inspected on a daily basis, and the entire site is cleaned using LRTC's power vacuum and sweeper power brooms as part of LRTC's routine housekeeping. Site surfaces are kept clean to assist in ensuring sediment and contaminants do not enter nearby surface waters.

LRTC staff and Environmental Technical Services (ETS) perform site observations. ETS has been retained to perform random site inspections and to advise LRTC as to effective pollution prevention improvements. Mr. Lou Butty, of American Textiles, a pollution absorbent/prevention materials expert and vendor, performs site inspections during the wet season to evaluate the condition and placement of absorbent snakes, socks, pads, and fabrics.

LRTC's Stormwater Pollution Prevention Plan includes the inspection and documentation of drop inlet and interceptor conditions each quarter, dry season, and annually. Monthly inspections are required during the wet season. LRTC and ETS have elected to document all inspection results on a monthly basis. The results are included in the Annual Report for Stormwater Discharges Associated with Industrial Activities

## 2.4 Purging and Cleaning of the Storm Drains

Plans for cleaning the five stormwater interceptors were developed by Levin Richmond Terminal personnel with Environmental Technical Services in June 2003.

Environmental Technical Services (ETS) collected a water sample from each interceptor on June 23, 2004. The composite sample and cleanout included interceptors SW-3 through SW-7 located on the Former United Heckathorn Facility,

### Main Terminal and Parr Yard

The samples were composited as one sample for analyses. The purpose of sampling/analyses was to determine if stormwater contained within the interceptors could be discharged into the local sanitary sewer.

The composite sample was designated as No. SW-1, SW-2, SW-3 through SW-7, SW-10. The sample was analyzed for Total Petroleum Hydrocarbons as gasoline, benzene, toluene, ethyl benzene, and total xylenes (TPHg, & BTEX using

EPA Method 8015 modified/8020), Total Petroleum Hydrocarbons as diesel (TPHd, using EPA Method 8015 modified, extractable), motor oil (using EPA Method 413.1), pesticides (using EPA Method 8081, CAM 17 metals (using EPA Method 6010B), pH. (using a Hydec pH meter).

Certified clean, properly preserved bottles were supplied by North State Analytical Laboratories. The bottles were stored in sealed plastic bags and placed within tightly sealed containers to prevent contamination. Tony Lester of LRTC collected the stormwater samples. Mr. Lester was trained in proper sample collection, storage, and maintenance of clean sample containers and equipment. A dedicated disposable bailer was used for each stormwater drain. Disposable latex gloves were changed when an unclean surface was encountered and between samples. Headspace was eliminated in sample bottles and appropriate preservatives used.

Samples were stored in a clean cooler on clean ice and transported to a qualified hazardous waste laboratory, under chain of custody, within the sample holding time. Each sample was properly labeled with LRTC, interceptor number, preservative, date, time, and name of sampler.

Upon completion laboratory analytical results were presented to the City of Richmond Waste Water Division, Pretreatment Program, for review to determine if water removed during the stormwater interceptor's cleaning process could be discharged into the sanitary sewer. Upon approval, the City of Richmond inspected the storm drains and sanitary sewer and an Industrial Discharge Permit was issued. The Waste Water Division was notified 48-hours prior to the project start.

LRTC's OSHA certified personnel emptied and cleaned interceptors SW-3 through SW-7, under a site-specific Health and Safety Plan. LRTC pumped water from the interceptors utilizing a specially equipped water truck. Water was discharged from the water truck directly into the sanitary sewer. Sediment was removed from the interceptors using stormwater to liquefy the sediment, which was then pumped into the vacuum truck. Sediment was released from the truck onto 6-ml plastic and covered with 6-ml plastic bermed with K-Rail. Sediment was stored away from the drop inlets to be disposed of at a qualified landfill.

Subsequent to emptying, each interceptor's floor and sidewalls was pressure-washed. This process was repeated until all sediment had been removed and the cleaning of each interceptor complete.



Pre-Interceptor Clean Out, Sanitary Sewer Discharge Permit, Levin-Richmond Terminal Corporation  
Collected Stormwater Analytical Results, Collected June 23, 2004

Constituent	SW-1, SW-2, SW-3 through SW-7, SW-10	Detection Limit	Unit	EPA Method
Diesel Fuel #2	ND	0.5	ppm	8015M
Gasoline Range Organics	102.0	50.0	ppb	8020F
Benzene	ND	0.5	ppb	8020F
Toluene	ND	0.5	ppb	8020F
Ethyl benzene	ND	0.5	ppb	8020F
Xylenes	ND	1.0	ppb	8020F
MTBE	ND	0.5	ppb	8020F
HEM	ND	5.0	ppm	A 5520F
Motor Oil	ND	0.5	ppm	CATFH
TSS	307.0	5.0	ppm	E160.2
PH	7.5	NA	PH Units	Hydec Meter
Antimony	ND	0.05	ppm	6010B
Arsenic	ND	0.05	ppm	6010B
Barium	1.08	0.05	ppm	6010B
Beryllium	ND	0.05	ppm	6010B
Cadmium	ND	0.05	ppm	6010B
Chromium	0.15	0.05	ppm	6010B
Cobalt	ND	0.05	ppm	6010B
Copper	0.29	0.05	ppm	6010B
Lead	0.42	0.05	ppm	6010B
Molybdenum	ND	0.05	ppm	6010B
Nickel	0.41	0.05	ppm	6010B
Selenium	ND	0.10	ppm	6010B
Silver	ND	0.05	ppm	6010B
Thallium	ND	0.10	ppm	6010B
Vanadium	0.56	0.05	ppm	6010B
Zinc	1.73	0.05	ppm	6010B
Constituent	SW-1, SW-2, SW-3 through SW-7, SW-10	Detection Limit	Unit	EPA Method
Pesticides	ND	Varies	ppb	8081

MTBE = Methyl-t-butyl Ether

TSS = Total Suspended Solids

ND = Not Detected for this constituent

### 3.0 SAMPLING OF STORMWATER INTERCEPTORS SUBSEQUENT TO RAINFALL

Rainfall did not occur through June 30, 2005 in quantities sufficient to create an outpour of stormwater from interceptors SW3 through SW7. LRTC personnel, were able to empty all stormwater and sediment from each interceptor prior to fall rainfall allowing LRTC to enter the rainy season with dry interceptors. This practice allows LRTC to prevent the discharge of water and sediments from these interceptors into the Lauritzen Channel and is scheduled to be repeated each year subsequent to seasonal rainfall.

### 4.0 BETTER BUSINESS PRACTICES / GOOD HOUSE KEEPING

Levin-Richmond Terminal Corporation has been working closely with Environmental Technical Services improving and upgrading each site process that could adversely impact the environment. Improvements are not limited to but include the following:

#### 4.1 Street Sweeper

In 2001 LRTC purchased an in-house Tennant vacuum power sweeper, which is scheduled to perform daily sweeping of outside surface areas, and cleanup following the loading of ships. The sweeper is also positioned and manned during appropriate cargo operations. The sweeper is covered by a maintenance contract and is fully maintained by Tennant's service technicians.

A second vacuum power sweeper, manufactured by Sentinel, was purchased by LRTC and working onsite by January 1, 2004.

#### 4.2 Water Truck

An LRTC water truck has been converted to pump and contain water from interceptors SW-3 through SW-7 prior to permitted discharge into the sanitary sewer. This prevents the stormwater within interceptors SW-3 through SW-7 from reaching levels that outflow into the Lauritzen Channel.

#### 4.3 Vacuum Truck

An LRTC vacuum truck has been converted to pump and contain sediments from drain inlets and interceptors.

#### 4.4 Brooms

LRTC operates two (2) IT-28 tractors with broom attachments to perform clean up of the capped surface following cargo operations.

#### 4.5 Hay Bales

Hay bales are placed around the entirety of each interceptor and storm drain. During cargo handling stormdrain inflows within the work area are covered with sediment proof fabric and hay bales. Interceptor SW-3, located near the hopper building, is covered with plastic when the hopper is in use, to prevent the dropping of material from the hopper onto the interceptor. The steel plate covering interceptor SW-7 has a tight seal. Therefore, it is doubtful material would enter the basin. However, covering the interceptor is an added precaution.

A daily inspection is conducted by supervisors of all working stockpiles, mobile equipment and conveying equipment, for containment and cleanliness to eliminate the buildup of material on jackwalls, equipment, roadways, and surfaces. Small spills are given the same attention as large spills.

Cargo stockpiles are stored away from surface waters, drains, and stormwater inlets. L-Rail is placed around stockpiles for containment.

#### 4.6 Absorbent Materials

Mr. Lou Butty, of American Textile, was retained to direct the placement of appropriate absorbent snakes, socks, pillows, and filters, around and within each interceptor and storm drain. The absorbent materials are photosensitive and have a limited life span. Each absorbent type is closely monitored and on a replacement schedule. The absorbent materials are white, allowing easy detection of saturation with waste.

Clean up stations have been placed strategically throughout the site in close proximity to areas where potential contaminants are used or stored and within each work vehicle. These materials are stored in foil factory-sealed bags to maintain their integrity. Ample supplies of absorbents are stored at LRTC.

A Dock Emergency Response Station has been established to efficiently organize access to adequate cleanup supplies.

Exposed soil and ties beneath railroad car "parking stations" have been covered with "Trackmat", an absorbent fabric barrier, prescribed and provided by American Textiles. This material is scheduled for routine replacement.

Mr. Butty inspects LRTC's absorbent supply and placement at the beginning of each wet season, then instructs as to effective changes in material, quantity, or placement, which could increase filtration efficiency.

Throughout the wet season hay bales and absorbents surround each drain inlet. Stormwater runoff must flow through these prior to entering the stormwater interceptor or drain outflow. Additional hay bales, sediment pillows, and absorbent materials were added to this area during the wet season's loading and unloading activities.

During the dry season interceptors were sealed by pressing hay bales, absorbents, and sediment proof fabric tight against each system's inflow. Inflow grates flush with grade are sealed with plastic sheeting. Where traffic allows each grate is covered with, and surrounded by, hay bales.

#### 4.7 Interceptor Improvements

In 2004, the stormwater collection trench, which flows to monitoring point SW-1, was upgraded by sealing the trench surface with asphaltic concrete. The trench was excavated at seven locations and sump basins constructed to allow the settling of sediments onto the basin floor. Surface cleanout grates were installed at grade. The storm drain interceptor system was thoroughly cleaned and upgraded with four new baffles, five compartments, and covered with steel plates.

New hay bales were continually placed along the perimeter of each drain inlet. Additional absorbents were placed within the last interceptor compartment.

An Ultraguard Sock was placed over the interceptor's inflow and outflow pipes to decrease suspended solids.

Wright Avenue was bermed at a low point, and the curbing at the property line was improved. Additional berming was added to all equipment and storage areas.

All basins and the primary interceptor associated with stormwater system SW-1 were emptied and cleaned during the 2004-2005 reporting year to assist in decreasing contaminants,

To prevent dust and debris from entering storm drains during the dry season, all associated openings are sealed using plastic, hay bales, and/or sediment proof fabric. Stormwater pollution prevention materials remain in place should off-season rainfall occur.

## SW-2

Interceptor SW-2 was upgraded to an aboveground interceptor in 2001, and constructed with three-tiered baffled chambers to allow the settling of sediments into the chamber floor.

In 2002, a concrete berm with a small opening was constructed around the interceptor's perimeter. Hay bales and absorbents surround this opening, creating a filtration system. Stormwater runoff must flow through the opening prior to entering a second filtration system surrounding the interceptor's inflow.

Additional hay bales, sediment pillows, and absorbents will be added to this area during the wet season's loading and unloading activities to collect sediment prior to entering the interceptor.

An Ultraguard Sock was placed on the cane pipe, which transports water from the second to the third and final chamber, to collect suspended solids and decrease contaminants before stormwater discharges into the bay.

All basins and the primary interceptor associated with stormwater system SW-2 were emptied and cleaned during the 2004 - 2005 reporting year. Absorbents are replaced within each system's inlet(s). Inlets are also covered with plastic sheeting and/or hay bales during site operations.

All associated openings are sealed using plastic, hay bales, and/or sediment proof fabric during the dry season to keep interceptors clean. Pollution prevention materials remain in place throughout the year.

## SW-3 through SW-7

These stormwater systems did not have outflow during the two sampling events and were not sampled. All basins and the primary interceptors associated with stormwater systems SW-3 through SW-7 were emptied and cleaned during the 2004 - 2005 reporting year. These interceptors are scheduled to be emptied and cleaned several times throughout the year.

Absorbents are replaced within each system's inlet(s). Inlets are also covered with plastic sheeting and/or hay bales during site operations.

All associated openings are sealed using plastic, hay bales, and/or sediment proof fabric during the dry season to keep interceptors clean. Pollution prevention materials remain in place throughout the year.

## SW-8, SW-9

Additional absorbents have been placed around and within these interceptors.

An Ultraguard Sock was placed on the drain's outlet to collect suspended solids and decrease contaminants before stormwater discharges into the Parr Canal. The sock is removed, emptied, and replaced as needed.

Each storm drain entry is sealed during the dry season, to prevent dust and debris from entering. The drains are sealed using plastic, hay bales, and/or sediment proof fabric. Stormwater pollution prevention materials are in place at all times.

## SW-10

In 2001 this drop inlet was upgraded to an interceptor, constructed with two baffles and three chambers, to allow the settling of sediments into the chamber floor. Additional hay bales and absorbents have been placed around and within the interceptor and are replaced regularly.

This interceptor was emptied and cleaned during the 2004 - 2005 stormwater reporting year.

An Ultraguard Sock was placed on the interceptor's outflow where suspended solids are captured prior to discharge into the Parr Canal.

All associated drain openings are sealed during the Dry Season using hay bales, sediment proof fabric, and/or plastic. Absorbent materials remain in place.

## Training

LRTC personnel working with potential contaminants are OSHA 40-hour Hazmat trained, with a yearly eight-hour refresher course. Qualified personnel are also spill-response trained.

On September 22 through 24, 2004, Bluewater & Associates conducted Hazardous Materials, Spill Emergency Response, Health and Safety, training at LRTC. Twenty-five LRTC employees completed certification. LRTC will continue annual training and certification. Annual training and certification are an integral component of LRTC's best management plan.

Training included but was not limited to the following:

- OSHA Hazardous Materials Standard
- Recognizing hazardous materials
- Hazardous materials basics, terms, and definitions
- Hazardous communications (HMIS, NFPA, MSDS's, DOT and ERG)
- Decontamination
- Toxicology, PPE,
- Confined space entry
- Department of Transportation exercises
- Spill control, containment, and cleanup
- Emergency procedures, and ICS

Environmental Technical Services (ETS) instructed a stormwater pollution prevention course for all of LRTC's supervisors in January 2005. The course included: regulations, Best Business Management Practices, surface water sensitivity, spill prevention, spill response, good housekeeping, pollution prevention, sampling and analyses, benchmarks, and reporting.

LRTC's stormwater pollution prevention supervisor Tony Lester, attended additional Blue Water and Associates, Inc. training, including the Qualified Individual Workshop, June 25 and 26, 2003: and the 2005 West Coast Spill Response School, April 19 through 21, 2005.

2005 West Coast Spill Response School Training included but was not limited to the following:

- Site safety
- Initial response and assessment actions
- Maritime security concerns
- Oil spill simulations
- Boom design and strategy
- Skimmer design and strategy
- Alternate response options
- Oiled wildlife cautions
- Shoreline clean-up assessments (SCAT)
- Decontamination
- Spill impacts and cost concerns
- Survey of response equipment staging area
- Initial response strategies
- Site protection strategy deployment

#### 4.9 Marine Spill Emergency Response

LRTC maintains a verbal contract with Zaccor Companies Inc., an emergency response contractor, to respond to an LRTC marine spill, should one occur. Zaccor Companies contracts with FOSS Environmental Infrastructure to provide 24-hour emergency response on both land and water.

This contract includes providing emergency response vessels, personnel, absorbent consumables and Coast Guard approved oil containment boom.

The Coast Guard Marine Safety Office (MSO), requires that each visiting cargo vessel must have an existing OSRO with an emergency response contract, prior to the Coast Guard allowing entry into US Ports.

#### 4.10 Inspections

Daily inspections are conducted by supervisors and employees of all working stockpiles, mobile equipment, and conveying equipment, for containment and cleanliness to eliminate the buildup of material on jackwalls, equipment, roadways, and surfaces. Small spills are given the same attention as large spills.

LRTC staff and/or Environmental Technical Services (ETS) perform site observations. ETS has been retained to perform site inspections randomly and to advise LRTC as to effective pollution prevention improvements. Mr. Lou Butty, of American Textiles, a pollution absorbent/prevention materials expert and vendor, performs site inspections during the wet season to evaluate the condition and placement of absorbent snakes, socks, pads, and fabrics.

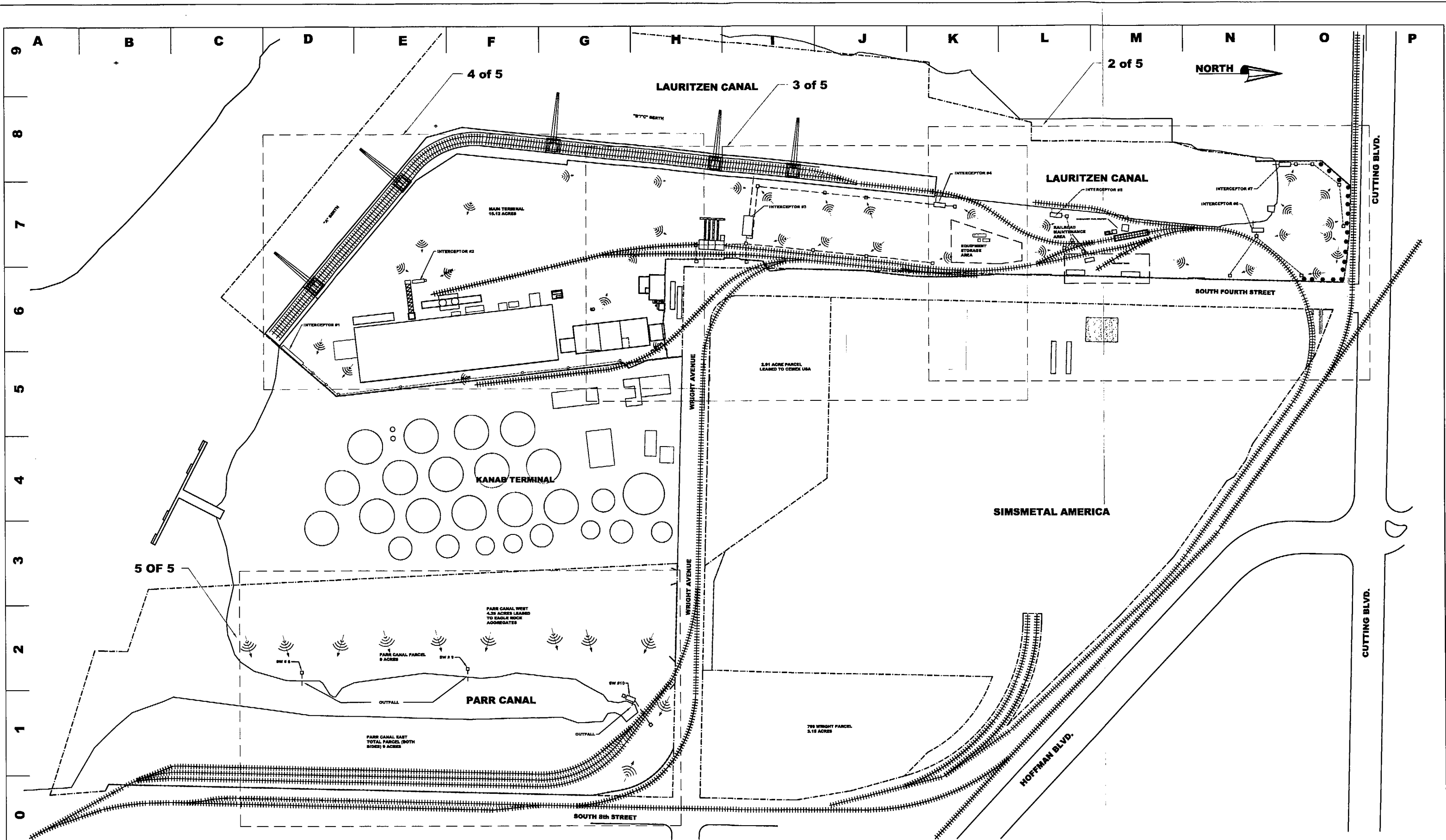
#### 5.0 SUMMARY

The finding and results submitted in this document satisfy the requirements of the Operations and Maintenance Plan, as stipulated by the U.S. EPA Consent Decree for the completed Upland Cap Installation for the Former United Heckathorn Facility, Richmond, California.



## **Attachment A**

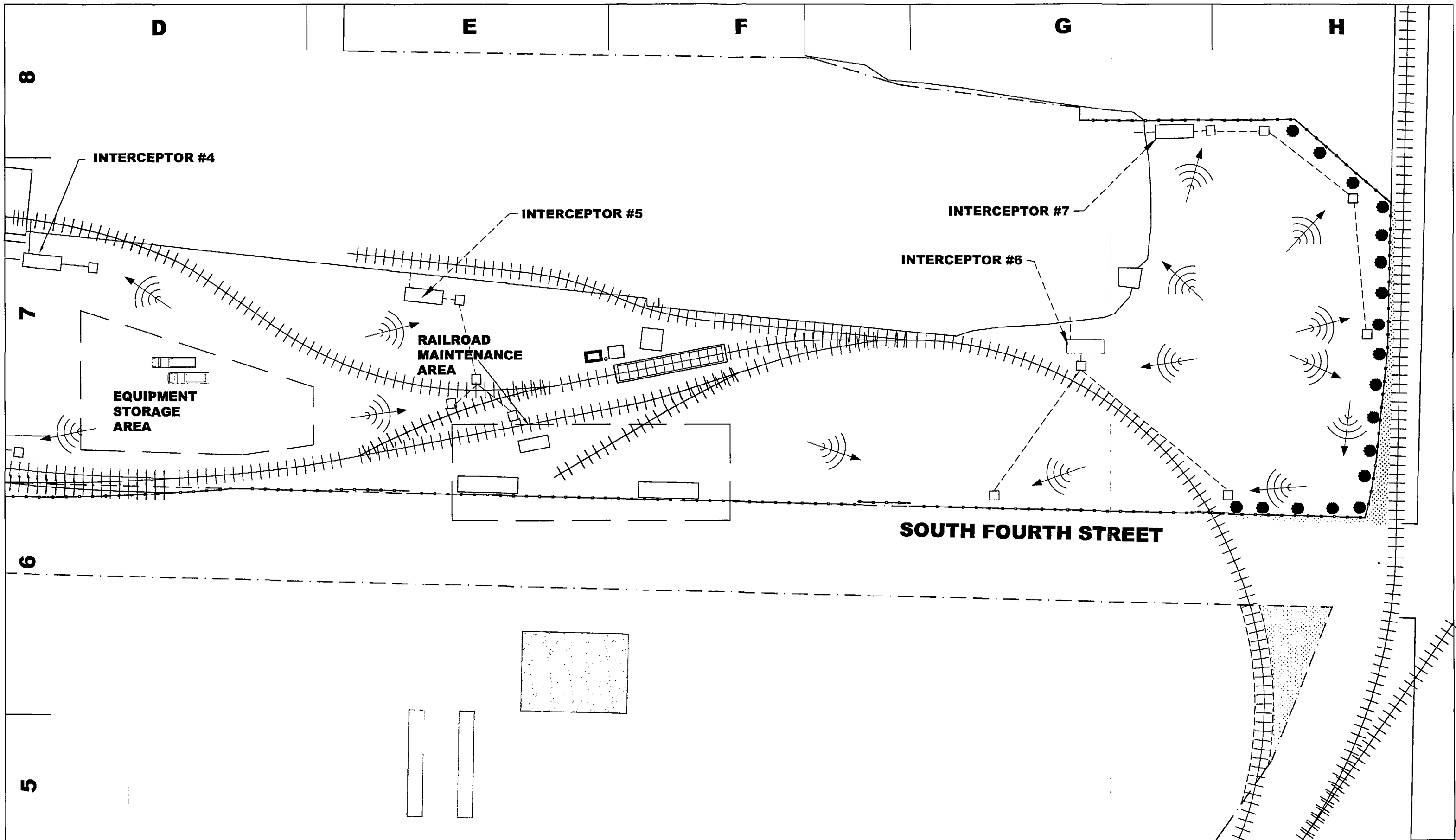
### **Plates**



SCALE 1" = 200'

# **LEVIN-RICHMOND TERMINAL** **STORM WATER FLOW, CATCH BASINS AND INTERCEPTORS**

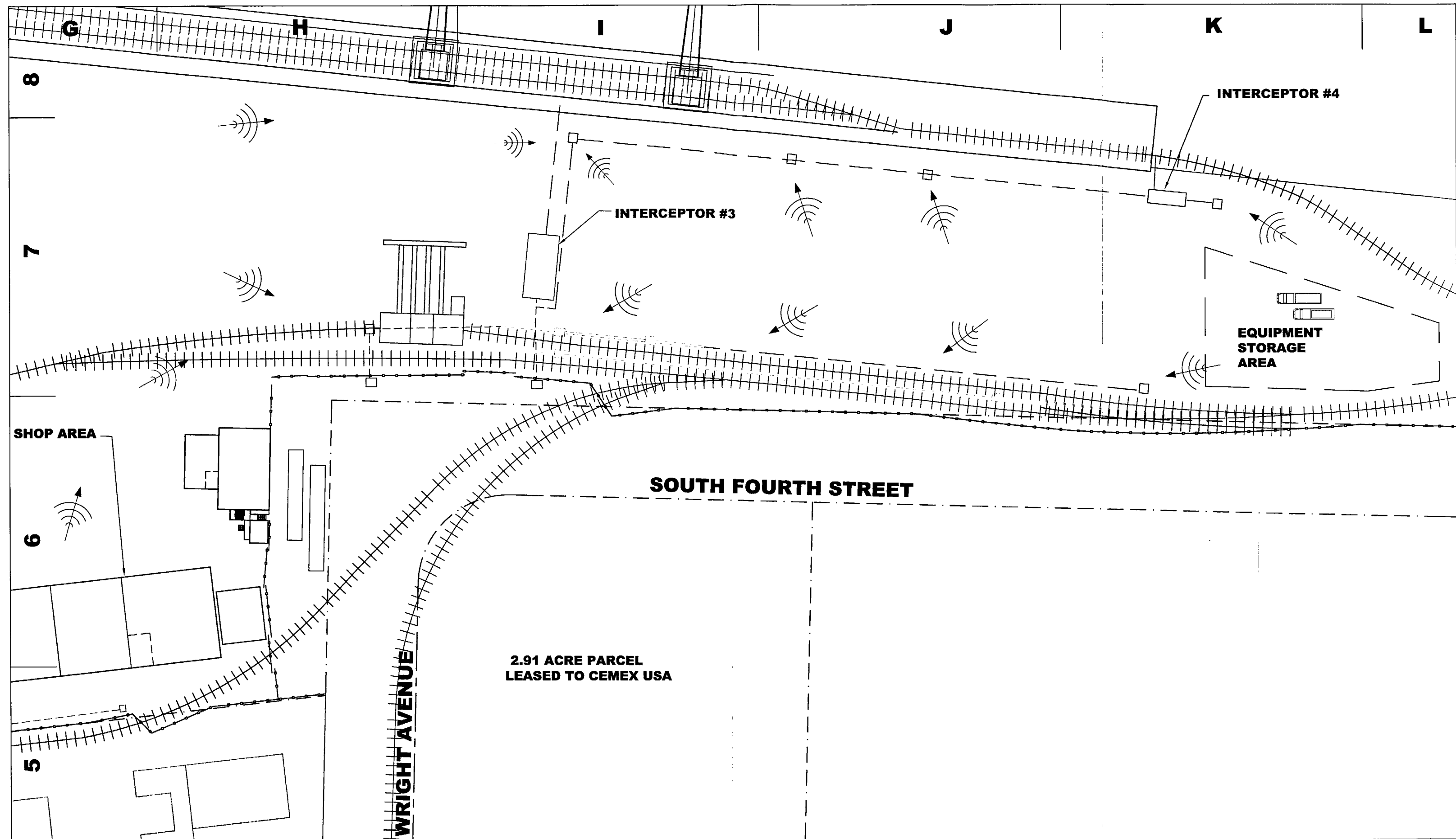
1 OF 5



SCALE 1" = 60'

**LEVIN-RICHMOND TERMINAL**  
**STORM WATER FLOW, CATCH BASINS AND INTERCEPTORS**

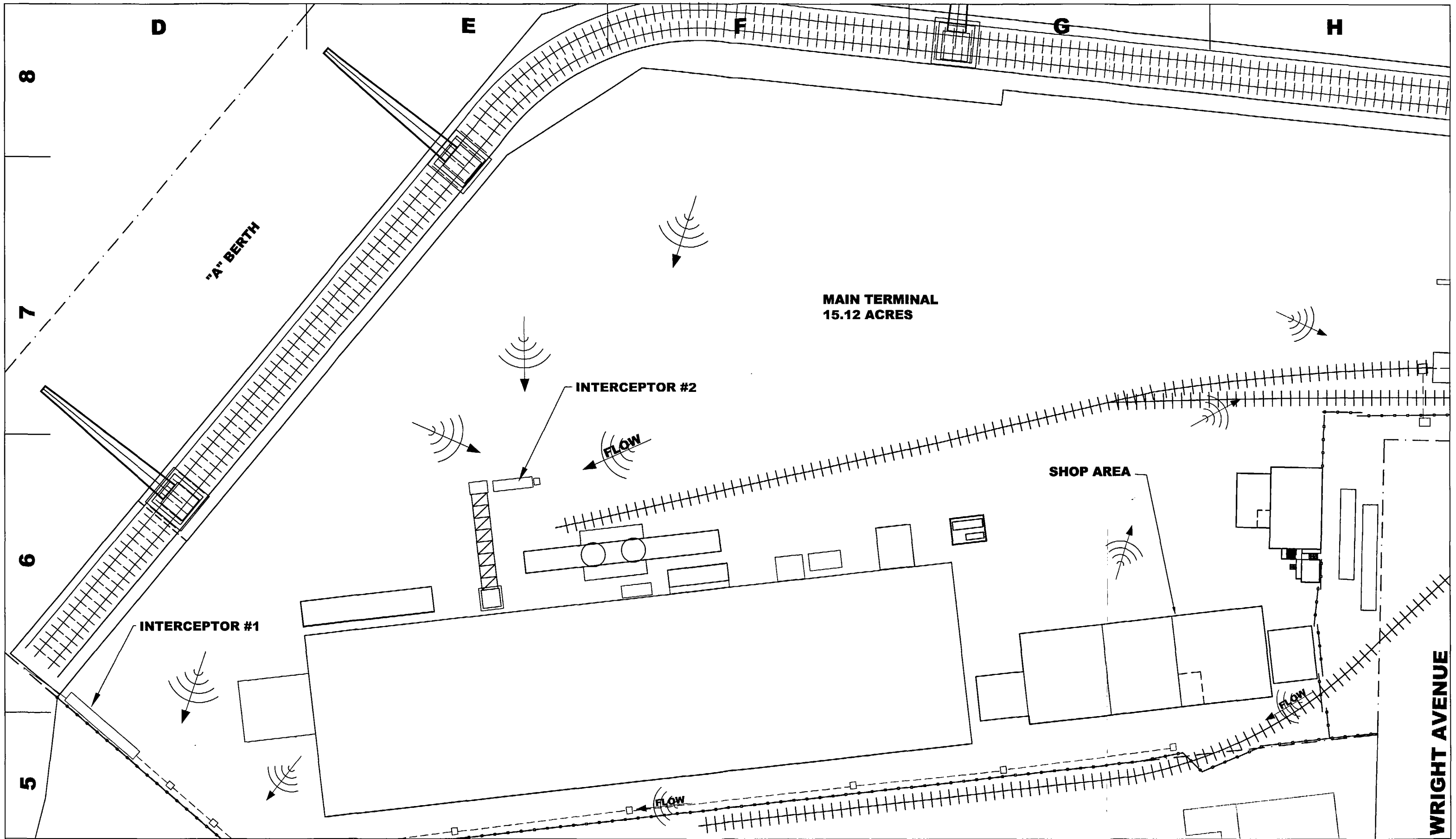
2 OF 5



SCALE 1" = 60'

**LEVIN-RICHMOND TERMINAL**  
**STORM WATER FLOW, CATCH BASINS AND INTERCEPTORS**

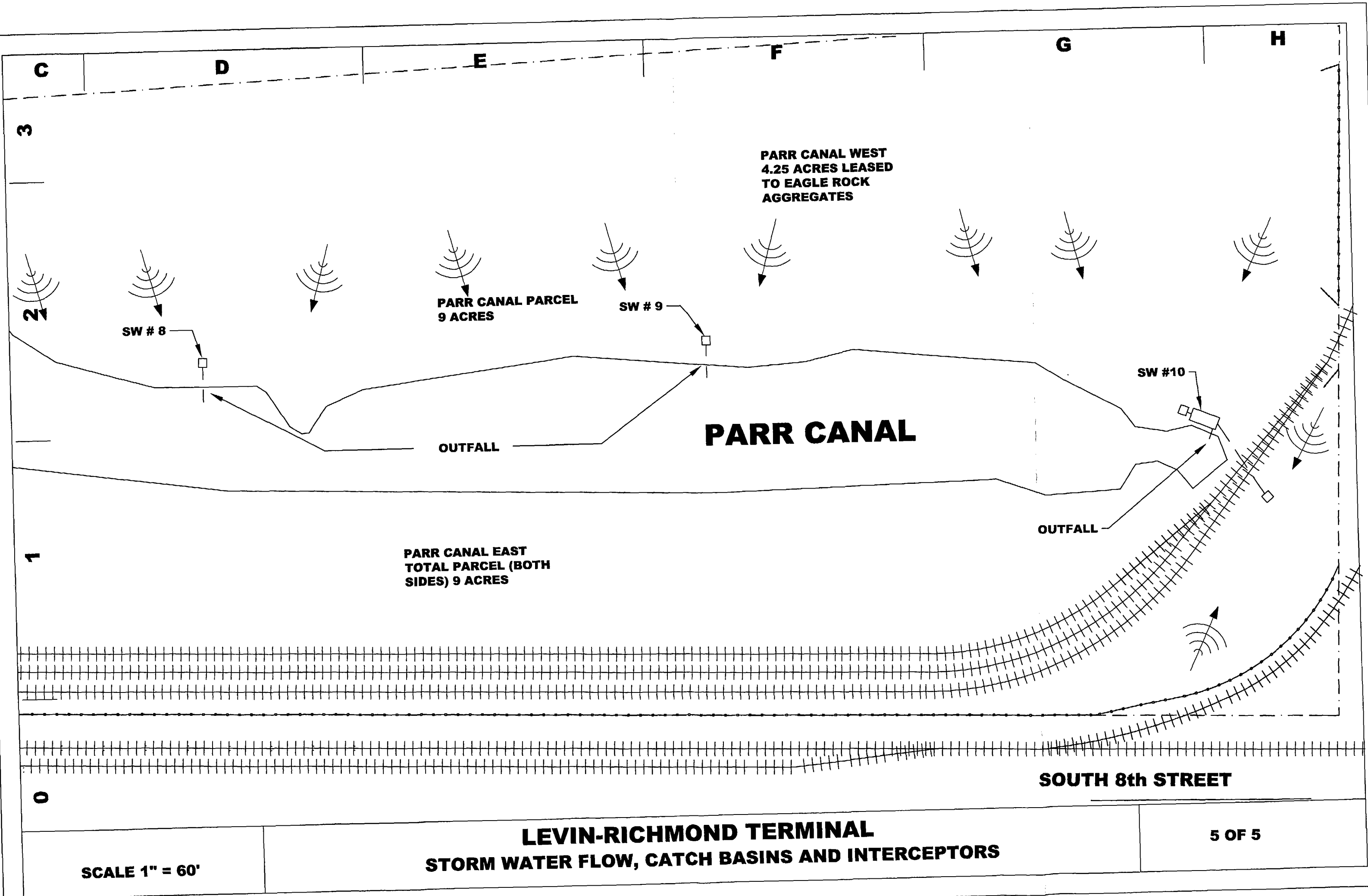
3 OF 5



SCALE 1" = 60'

**LEVIN-RICHMOND TERMINAL**  
**STORM WATER FLOW, CATCH BASINS AND INTERCEPTORS**

4 OF 5



**Attachment B**

**Buster Building, General Contractor  
Report of Cap Inspection, June 14, 2005**

Jun 15 05 04:08p

P.1



**Buster Building**

General Contractor - Lic. # 51317

298 N. Cragmont Ave. San Jose, Ca. 95127

Business: (408) 251-5446

Fax: (408) 251-3158

June 14, 2005

Environmental Technical Services  
1548 Jacob Avenue  
San Jose, CA 95118

Attn: Helen Mawhinney  
Senior Environmental Specialist

RE: Upland Cap Inspection, Former United Heckathorn Facility  
402 Wright Avenue, Richmond, California

Ms. Mawhinney:

The Upland Cap located at the Former United Heckathorn Facility, cap was inspected by John Peterson for Buster Building, General Contractor, License No. 513203 C8 (concrete), on June 14, 2005, and found to be intact and in good condition.

The cap's longevity was found to be uncompromised, with only occasional surface hairline cracks typical of those that develop subsequent to the curing of freshly poured concrete. The cracks are insignificant and not indicative of stress fractures. These surface cracks are too small to repair.

Sincerely,

John "Buster" Peterson  
General Contractor